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September 17, 2015

**BY ECF AND FACSIMILE**

Honorable Laura Taylor Swain  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: United States v. Stewart, 15 Cr. 287 (LTS)

Dear Judge Swain:

On behalf of defendant Sean Stewart in the above-referenced case, we respectfully request permission to file an oversized brief, exceeding any page limit by five pages. Our deadline to file a motion in this case is September 18, 2015. While we have been unable to locate any rules pertaining to page limit in criminal matters before Your Honor, we have noted that there is a 25 page limit in civil matters. Out of an abundance of caution, we assume that the limitation applies to criminal matters as well and thus make this application. The motion will contain three separate points, including a motion to dismiss the Indictment on constitutional grounds, as well as a motion for a detailed bill of particulars. Given the complexity of the issues discussed in the motion, including the posture of insider trading law in the wake of a recent Second Circuit case, *United States v. Newman*, 773 F.3d 438 (2d Cir. 2014), we respectfully request permission to file an oversized brief of 30 pages. The government does not object to this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Tai H. Park'.

Tai H. Park